John A. Leonard, Esquire Leonard, Key & Key, PLLC 900 8th Street, Suite 320 P.O. Box 8385 Wichita Falls, Texas 76307-8385 Telephone: 940/322-5217 Facsimile: 940/322-3381 Email: lenbiz@mac.com

Proposed Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS WICHITA FALLS DIVISION

IN RE:	)	
GARRY ALLEN FINCH	) ) BK. NO. 08-70372-HDF	I-13
SONIA ANN FINCH	Ò	
Debtors.	) CHAPTER 13 CASE	

## AGREED MOTION FOR SUBSTITUTION OF COUNSEL

TO THE HONORABLE HARLIN D. HALE, UNITED STATES BANKRUPTCY JUDGE:

Garry Allen finch and Sonia Ann Finch, Debtors, files their Motion for Substitution of Counsel and respectfully shows the Court as follows:

- 1. Debtors were represented by Monte J. White, Monte J. White & Associates, P.C., 1106 Brook, Wichita Falls, Texas 76301.
  - 2. Debtors want John A. Leonard to represent them in this case.
- 3. The attorneys' fees due, pursuant to the plan's term, should be paid to John A. Leonard.

WHEREFORE, Debtors request the Court enter an order allowing John A. Leonard to substitute for Monte White and represent him in this case; that the attorneys' fees payable pursuant to the plan be paid to John A. Leonard; and he requests general relief.

John A. Leonard, Esq.

LEONARD, KEY & KEY, PLLC.

900 Eighth Street – Suite 320

P.O. Box 8385

Wichita Falls, Texas 76301

Telephone: (940) 322-5217

Facsimile: (940) 322-3381

E-mail: lenbiz@mac.com

By: /s/ John A. Leonard
John A. Leonard
State Bar No. 12209600
Attorneys for Debtor

## **CERTIFICATE OF CONFERENCE**

On September 8, 2009, Monte White's office was contacted and he is not opposed to this Motion.

On September 8, Walter O'Cheskey's office was contacted and he is not opposed to this Motion.

/s/ John A. Leonard
John A. Leonard

## **CERTIFICATE OF SERVICE**

I, John A. Leonard, do hereby certify that a true and correct copy of the above and foregoing instrument has been sent on this the 11<sup>th</sup> day of September 2009 ECF to the following:

Monte J. White Monte J. White Associates 1106 Brook Avenue Wichita Falls, Texas 76301

U. S. Trustee William Neary 1100 Commerce Street, Room 9C60 Dallas, Texas 75242

Chapter 13 Trustee

Walter O'Cheskey 6308 Iola Avenue Lubbock, Texas 79424

All persons filing a notice of appearance

/s/ John A. Leonard
John A. Leonard

## DEBTOR'S APPROVAL

We hereby approve the withdrawal of Monte White as my attorney of record and the substitution of John A. Leonard as my attorney of record.

Page 3 of 3